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9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 IN RE: CATHODE RAY TUBE (CRT)
13 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-JST

MDL No. 1917

14 This Document Relates to:

15 *Sears, Roebuck and Co. and Kmart Corp. v.*
16 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-
17 05514

**DECLARATION OF CATHLEEN H.
HARTGE IN SUPPORT OF DEFENDANT
LG ELECTRONICS, INC.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL IN CONNECTION WITH
LG ELECTRONICS, INC.'S MOTION
FOR BIFURCATION AND BENCH
TRIAL**

[Administrative Motion to Seal and [Proposed]
Order filed concurrently herewith]

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28 MDL No. 1917
Master No. 3:07-cv-05944-JST

**DECLARATION OF CATHLEEN HARTGE IN SUPPORT OF DEFENDANT LG ELECTRONICS, INC.'S
ADMINISTRATIVE MOTION TO FILE UNDER SEAL IN CONNECTION WITH LG ELECTRONICS,
INC.'S MOTION FOR BIFURCATION AND BENCH TRIAL**

1 I, Cathleen H. Hartge, hereby declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of
3 record for Defendant LG Electronics, Inc. ("LGE"), in the above entitled action. I am licensed
4 to practice law in the State of California. I make this declaration based on my personal
5 knowledge and, if called upon as a witness, could and would testify competently as to the
6 matters set forth below.

7 2. Pursuant to Civil Local Rules 7-11 and 79-5, I submit this declaration in support
8 of LGE's Administrative Motion to File Under Seal.

9 3. LGE seeks permission to file under seal the highlighted portions of the sealed
10 version of its Motion for Bifurcation and Bench Trial and the entirety of Exhibits A through F
11 attached to my declaration in support of that motion.

12 4. The material referenced in Paragraph 3 contains discussion, analysis, references
13 to, or information taken directly from, material designated by Plaintiffs Sears, Roebuck and Co.
14 and Kmart Corporation; and Defendants Hitachi, Ltd., Hitachi Displays, Ltd. (n/k/a Japan
15 Display Inc.), Hitachi Asia, Ltd., Hitachi America, Ltd., Hitachi Electronic Devices (USA),
16 Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.), Panasonic Corporation of
17 North America, and MT Picture Display Co., Ltd. (the "Designating Parties") as "HIGHLY
18 CONFIDENTIAL" under the Stipulated Protective Order (Dkt. No. 306).

19 5. LGE seeks to submit the above material under seal in good faith in order to
20 comply with the Stipulated Protective Order in this action and the applicable Standing Order and
21 Local Rules. Because the information LGE seeks to submit under seal has been designated as
22 Highly Confidential by other parties, LGE is filing the accompanying Administrative Motion,
23 and will be prepared to file unredacted versions of the above-referenced documents in the public
24 record if required by Civil Local Rule 79-5(e).

25 I declare under penalty of perjury under the laws of California that the foregoing is true
26 and correct.

1 Executed on the 12th day of August 2016 in San Francisco, California.
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3 /s/ Cathleen Hartge
4 CATHLEEN HARTGE
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**DECLARATION OF CATHLEEN HARTGE IN SUPPORT OF DEFENDANT LG ELECTRONICS, INC.'S
ADMINISTRATIVE MOTION TO FILE UNDER SEAL IN CONNECTION WITH LG ELECTRONICS,
INC.'S MOTION FOR BIFURCATION AND BENCH TRIAL**